

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

MICHAEL T. FLYNN,

Defendant.

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Crim. No. 17-232 (EGS)

Sentencing: December 18, 2018

ADDENDUM TO GOVERNMENT’S MEMORANDUM IN AID OF SENTENCING

This Addendum to the Government’s Memorandum in Aid of Sentencing describes the significance and usefulness of defendant Michael T. Flynn’s assistance to the government, and the timeliness of that assistance. As described herein, the defendant’s assistance to the government was substantial and merits consideration at sentencing.

I. Significance and Usefulness of the Defendant’s Assistance

The defendant has assisted with several ongoing investigations: a criminal investigation [REDACTED], the Special Counsel’s Office’s (“SCO”) investigation concerning any links or coordination between the Russian government and individuals associated with the campaign of President Donald J. Trump,

[REDACTED]. As part of his assistance with these investigations, the defendant participated in 19 interviews with the SCO or attorneys from other Department of Justice (“DOJ”) offices, provided documents and communications [REDACTED]

While this addendum seeks to provide a comprehensive description of the benefit the

government has thus far obtained from the defendant's substantial assistance, some of that benefit may not be fully realized at this time because the investigations in which he has provided assistance are ongoing. The defendant and the government agree that sentencing at this time is nonetheless appropriate because sufficient information is available to allow the Court to determine the import of the defendant's assistance to his sentence.

A. [REDACTED] Criminal Investigation

The defendant has provided substantial assistance in a criminal investigation [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

B. The Special Counsel's Office's Investigation

The defendant has also assisted with the SCO investigation concerning links or coordination between the Russian government and individuals associated with the Trump campaign. *See* Office of the Deputy Att'y Gen., Order No. 3915-2017, *Appointment of Special Counsel to Investigate Russian Interference with the 2016 Presidential Election and Related Matters*, May 17, 2017 ("ODAG Order"). The defendant assisted the SCO's investigation on a range of issues, including interactions between individuals in the Presidential Transition Team and Russia, [REDACTED]

[REDACTED]. A non-exhaustive summary of the relevant information the defendant provided is described below to aid the Court's assessment of the defendant's assistance.

i. *Interactions Between the Transition Team and Russia*

The defendant provided firsthand information about the content and context of interactions between the transition team and Russian government officials. For example, after the election, the defendant communicated with the Russian ambassador to the United States as a

representative of the transition team on two sensitive matters: a United Nations Security Council vote on a resolution calling for Israel to cease settlement activities in Palestinian territory and the Obama Administration's imposition of sanctions and other measures on Russia for interfering in the 2016 election. Several senior members of the transition team publicly repeated false information conveyed to them by the defendant about communications between him and the Russian ambassador regarding the sanctions. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The defendant also provided useful information concerning [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The usefulness of the defendant's assistance is connected to its timeliness. The defendant began providing information to the government not long after the government first sought his cooperation. His early cooperation was particularly valuable because he was one of the few people with long-term and firsthand insight regarding events and issues under investigation by the SCO. Additionally, the defendant's decision to plead guilty and cooperate likely affected the decisions of related firsthand witnesses to be forthcoming with the SCO and cooperate. [REDACTED]

Respectfully submitted,

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